



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

CECW

07-May-2025

MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS (MSC)

SUBJECT: Feasibility Study Vertical Team Alignment and Command Validation

1. References

a. Assistant Secretary of the Army (Civil Works) (ASA(CW)) Memorandum, Implementation Guidance for Section 1001 of the Water Resources Reform and Development Act of 2014, Vertical Integration and Acceleration of Studies as amended by Section 1330(b) of the Water Resources Development Act (WRDA) of 2018, 8 March 2019

b. ASA(CW) Memorandum, Information for the Sponsor at the Agency Decision Milestone (ADM) for Feasibility Studies, 28 March 2016

c. CECW Memorandum, Subject: Vertical Team Alignment Memorandum (VTAM) Guidance, 29 July 2022

d. Civil Works Program Development Guidance, published annually

e. Engineer Pamphlet (EP) 1105-2-58, Continuing Authorities Program, 1 March 2019

f. EP 1105-2-61, Feasibility and Post-Authorization Study Procedures and Report Processing Requirements, 1 July 2023

g. EP 1105-2-64, Tribal Partnership Program, 22 February 2024

h. Engineer Regulation (ER) 1105-2-102, Watershed Studies, 1 April 2022

2. Purpose

The purpose of this memorandum is to clarify the process and expectations for ensuring Command oversight and Vertical Team alignment in U.S. Army Corps of Engineers (USACE) feasibility studies. This memorandum establishes the Command Validation Milestone and streamlines the requirements for the Vertical Team Alignment Memorandum. These changes will reinforce vertical alignment throughout the feasibility study process.

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a. This guidance supersedes CECW Memorandum, dated 29 July 2022, Subject: Vertical Team Alignment Memorandum (VTAM) Guidance, and the list of required elements to be included in the VTAM in EP 1105-2-61, paragraph 2-8.

b. The Command Validation Milestone replaces the Agency Decision Milestone (ADM) in the feasibility study process. EP 1105-2-61 will be revised to reflect this change at its next revision.

3. Command Validation Milestone Discussion

a. The Command Validation Milestone marks the corporate endorsement of the recommended plan, the engineering strategy, and the proposed way forward to complete feasibility level design, the final feasibility report, and the Chief's Report.

b. The goals of the Command Validation Milestone are twofold: 1) to ensure Command understanding and concurrence with the project recommendation while there is still time for Senior Leaders to influence the plan, and 2) to validate the engineering strategy to reach required engineering sufficiency during the feasibility phase across the vertical team.

c. The Command Validation Milestone will replace the Agency Decision Milestone. The Command Validation Milestone will be held immediately following concurrent review of the draft feasibility report.

d. All feasibility studies and post authorization studies that have not yet released their draft report on the date of this memorandum for concurrent public, technical, and policy review will conduct a Command Validation Milestone meeting instead of the Agency Decision Milestone. Continuing Authorities Program projects, programmatic Tribal Partnership Program feasibility studies, and watershed studies will continue to use the decision milestones described in EP 1105-2-58, EP 1105-2-64, and ER 1105-2-102.

4. Command Validation Milestone Requirements

a. Overview. A graphical overview of the Command Validation Milestone and its timing relative to other feasibility study decision milestones is included in Enclosure 1.

b. Command Validation Milestone Decision Maker. The Command Validation Milestone decision maker will be the Headquarters Chief of Engineers or their delegate. The decision maker for the Tentatively Selected Plan milestone will be the MSC Commander when decision-making has been delegated to the MSC, and the USACE Deputy Commanding General for Civil and Emergency Operations (DCG-CEO) when decision-making has been retained at Headquarters. This updates Table 4-1, paragraphs 4-7.f. and 4-9.c. of EP 1105-2-61. See Table 1 below.

Table 1
Milestone Decision-Making Delegation/Report Approval Level

Ongoing	Feasibility Decision Milestone	Decision-Making Delegated to MSC	Decision-Making Resides at Headquarters
Vertical Team Engagement	Alternatives Milestone	MSC Planning and Policy Chief	MSC Planning and Policy Chief
	Tentatively Selected Plan Milestone	MSC Commander	USACE DCG-CEO
	Command Validation Milestone	USACE Chief of Engineers	USACE Chief of Engineers

c. General Requirements. The general requirements for all milestone meetings in paragraph 4-4 of EP 1105-2-61 will be applied to the Command Validation Milestone meeting.

d. Project site visits. The District leadership will coordinate a site visit with the USACE Chief of Engineers or their designee in conjunction with the Command Validation Milestone meeting. These site visits will include the Non-Federal Sponsor and allow for open and transparent discussions of the project risks and long-term commitments. Site visits will typically be limited to twelve USACE participants and a project placemat will be used to brief.

e. Milestone Meeting Participants. Milestone meeting participants are summarized in Table 2. This modifies paragraph 4-4.c. and 4-9.c.(2)-(3) of EP 1105-2-61. Additional participants may be invited, as appropriate.

Table 2
Command Validation Milestone Required and Invited Participants

Required meeting participants	Invited meeting participants
Decision maker	Office of the ASA(CW)
MSC Commander	Agency Technical Review team lead
MSC Chief of Planning	MSC Chief of Operations
MSC Chief of Engineering & Construction	MSC or Headquarters Office of Counsel
District Planning Chief	Any other MSC or HQ representative from a discipline with high potential impact to the study and/or recommended project
District Chief of Engineering & Construction	
Planning Center of Expertise	
Policy and legal compliance review manager	
Non-Federal Sponsor	
District project delivery team (PDT) – Project Manager, Lead Planner, and Engineering Technical Lead	

f. Key Feasibility Study Tasks Prior to the Command Validation Milestone. The key feasibility study tasks listed in Table 4-2 of EP 1105-2-61 to be completed before the Agency Decision Milestone meeting will be updated to reflect that only the Agency

Technical Review, Public/Agency Review, Policy and Legal Compliance Review, and compilation of high significance comments of the draft feasibility report will be required to be completed before the Command Validation Milestone meeting is held.

See Table 3. The remaining items in Table 4-2 of EP 1105-2-61 are to be completed after the Command Validation Milestone and will take into consideration any decisions made at the Command Validation Milestone meeting (see Table 4 and paragraph j.).

Table 3
Key Feasibility Study Tasks (Not all-inclusive)

Milestone	Task
To be completed before the Command Validation Milestone	Agency Technical Review (ATR) of Draft Feasibility Report / NEPA document including cost estimates
	Public/Agency Review of Draft Feasibility Report / NEPA document, including Government-to-Government consultation.
	Policy and Legal Compliance Review of Draft Feasibility Report / NEPA document completed with comments documented in a Project Guidance Memorandum (PGM)
	Critical or High Significance comments from all reviews compiled, assessed, and actions to resolved determined and documented in a review summary

g. Timing of the Command Validation Milestone. The Command Validation Milestone meeting will be held within two months of the completion of the concurrent public, technical, and policy and legal compliance review of the draft report. This will allow the PDT to summarize any significant issues which arose during review. If IEPR is needed, the Command Validation Milestone will not wait for receipt of IEPR findings. If significant issues are identified during IEPR which conflict with command direction, those issues will be discussed at the comment resolution in-progress review (paragraph j).

h. Milestone Meeting Requirements. The Command Validation Milestone will meet all requirements for the Agency Decision Milestone listed in paragraph 4-9 of EP 1105-2-61, with the exception of the timing (paragraph 4-9.b.), decision-maker (4-9.c.) and requirement for a senior leader panel (paragraph 4-9.c.).

(1) The briefing should be primarily via study placemat and include the level of detail available immediately after the concurrent reviews.

(2) The Command Validation Milestone will include a discussion of significant comments from all reviews and proposed preliminary comment resolution. The discussion will capture and highlight the key technical and policy risks from the concurrent reviews of the draft report and explain to the decision maker what these risks mean to the study scope and schedule going forward.

(3) All required policy exceptions will be discussed at the Command Validation Milestone meeting, whether proposed or already submitted to the ASA(CW).

(4) The briefing will include status updates on significant topics such as effects of induced flooding, implementation plan for nonstructural measures, compliance with laws and regulations, and the strategy to reach required engineering sufficiency during the feasibility phase.

(5) A Memorandum for the Record will be prepared by the District within one week of the Command Validation Milestone meeting documenting all significant discussion and decisions.

i. Information for the Non-Federal Sponsor. The requirements of the ASA(CW) memorandum, Information for the Sponsor at the Agency Decision Milestone (ADM) for Feasibility Studies, will be addressed at the Command Validation Milestone meeting. This memorandum directs USACE to inform the non-federal sponsor that if the estimated project costs (of the agency-supported plan or the locally preferred plan) exceed estimated benefits when calculated using a real discount rate of 7 percent, the Office of Management and Budget (OMB), as required by Executive Order 12322, may advise the ASA(CW) that the project is not consistent with the President's policies and programs. Consequently, the project may not receive Administration support for authorization following completion of the feasibility study, the Chief of Engineers report, and subsequent project funding. See EP 1105-2-61, paragraph 4-9.a.

Table 4
Key Feasibility Study Tasks to be completed before an In Progress Review, following the Command Validation Milestone (Not all-inclusive)

Milestone	Task
Following the Command Validation Milestone	Draft PDT responses to all Policy and Legal Compliance Review comments contained in the PGM
	Independent External Peer Review (IEPR) of Draft Feasibility Report / NEPA document (if applicable; the IEPR panel has up to 60 days after the end of the public review of the draft report to submit the final IEPR report, and longer at the discretion of the Chief)
	Receive concurrence from State (or Tribal) Historic Preservation Officer on National Historic Preservation Act Section 106 determination of effect, and continue consultation on agreement document, if applicable
	Project Management Plan and review plan updated (if necessary) reflecting document scope and schedule to final report transmittal
	Update the study issue checklist to highlight remaining policy issues, and conduct vertical coordination as needed
	Any required policy exceptions submitted to the ASA(CW), if applicable

j. Comment Resolution In-Progress Review. After the Command Validation Milestone, an IPR will be held with the vertical team to ensure comment resolution once additional study tasks are complete (see Table 4). This IPR will be led by the District Planning Chief. The IPR will be documented in a Memorandum for the Record.

5. Vertical Team Alignment Memorandum Discussion

a. This guidance applies to VTAMs prepared for all new planning phase studies, or ongoing planning studies with changed scope, schedule, or funding streams. The VTAM requirement applies to all new and ongoing feasibility, post-authorization, and watershed studies. Continuing Authorities Program projects and programmatic Tribal Partnership Program studies are not required to prepare a VTAM. See EP 1105-2-61, paragraph 2-7. Applicability inquiries should be raised to the vertical team as early as possible for coordination and alignment. The processes and practices contained within this memorandum will be effective immediately.

b. The intent of the VTAM is to document an aligned scope, funding stream, and schedule of the study. The VTAM either verifies the study is within 3x3x3 requirements or explains the need and path ahead for a policy exception request. VTAM development and approval is an important component of the annual program development process.

(1) A VTAM which verifies the study is within 3x3x3 requirements will be submitted to Headquarters as documentation of the vertically aligned scope, schedule, funding stream and acknowledgement of study and project risks.

(2) A VTAM which identifies the need and path ahead for a policy exception request for study duration or cost will be included in the policy exception package processed by Headquarters and submitted to the ASA(CW).

c. The ability to execute high quality studies is dependent on development and execution of a study scope that uses the best available information and is documented in a Project Management Plan (PMP). To develop a study scope, a team will develop a risk register, study schedule and funding stream, and PMP, and provide these documents to their vertical team for review and alignment. Expectations are that districts will continue to ensure these actions are satisfied in study development, even though the risk register and PMP are not required VTAM enclosures.

d. The redefined VTAM required by this memorandum will narrow the focus of the VTAM and streamline the process to facilitate execution.

6. Vertical Team Alignment Memorandum Requirements

a. VTAM signature. The VTAM will be signed by the MSC Commander. If the VTAM confirms a study will be completed within 3 years and \$3 million total study cost, signature may be delegated to the MSC Chief of Planning.

b. Revised VTAM template. An updated VTAM template replaces the one referenced in the superseded 2022 memorandum and is provided as an attachment to this memorandum. This template focuses on the appropriate schedule and funding stream for the study as well as the documentation of vertical alignment of the scope. The VTAM submittal does not include the PMP, risk register, or any other documents. It is the responsibility of each District to ensure those documents are prepared, provided

to the vertical team to achieve alignment, and available if requested. The VTAM template (enclosure) supersedes the list of required elements in paragraph 2-8 of EP 1105-2-61, and paragraph 11.c.(2) of ER 1105-2-102 for watershed studies. All teams moving forward will use the updated VTAM template (enclosure).

c. Timelines for initial VTAM submission.

(1) The initial VTAM for the entire study schedule and funding stream for feasibility studies, limited reevaluation studies, and general reevaluation studies will be signed and transmitted to Headquarters within 60 days of the Alternatives Milestone Meeting. If the study's Alternatives Milestone Meeting is delayed beyond nine months of study initiation, the planned milestone date will be communicated to the Headquarters Chief of the Office of Water Project Review (OWPR).

(2) The initial VTAM for the entire study schedule and funding stream for validation studies will be signed and transmitted to Headquarters within 120 days of the study initiation.

(3) The initial VTAM for the entire study schedule and funding stream for watershed studies will be signed and transmitted to Headquarters within six months of the study initiation (ER 1105-2-102).

d. Delay in initial VTAM submittal. If the VTAM will be transmitted later than the timelines in paragraph 6.c., the District Planning Chief will notify the Headquarters Chief of OWPR of the delay as soon as practicable. In no cases will VTAM submittals be delayed more than 30 days beyond the timelines in paragraph 6.c.

e. Requirements for reviewing and updating a study VTAM. The scope developed at the initiation of the study can be highly uncertain. Until enough analysis and data collection has occurred to identify the tentatively selected plan there may be a high level of risk associated with the study scope and updates to the VTAM may be required.

(1) Minor changes. When changes to milestone dates do not impact the final Chief's Report or Director's Report milestone date and the total cost remains the same, no VTAM addendum or Headquarters coordination is necessary unless the funding stream changes. The MSC Planning Chief will coordinate required adjustments to the funding stream directly with the Headquarters Planning Portfolio Manager, and the team will keep moving ahead.

(2) Significant changes. At any point during the study, if significant changes to the study scope, schedule, or funding stream occur, which result in an increase to the total study cost or a change to the date of the final Chief's Report or Director's Report, an updated VTAM using the updated VTAM template will be submitted to Headquarters.

(3) Command Validation Milestone. The study team will revisit the original VTAM immediately following the Command Validation Milestone and, if necessary, develop an updated VTAM.

(4) Study completion. Not later than 120 days before the approved study completion date, the MSC Commander must provide either (a) an email to the Deputy Commanding General of Civil and Emergency Operations (DCG-CEO) with confirmation that the study is expected to be completed within the approved timeline, or (b) the firm date that an updated, signed VTAM and policy exception package for additional time and/or funding will be transmitted to Headquarters. If the study is not expected to be completed within the approved timeline, the MSC Commander will provide a memorandum to the DCG-CEO that includes a formal request for approval to continue obligating or expending funds after the approved completion date. The memorandum requesting approval to continue expending funds after the approved completion date will be submitted to the DCG-CEO and copied to the USACE Chief of Planning and Policy, the USACE Program Integration Division Chief, and the Planning Portfolio Manager.

f. Scoping Scenario Courses of Action (COA). The project delivery team (PDT) will use risk-informed scoping strategies. The PDT will formulate reasonably risk-informed scopes, or COAs, that are included as part of the VTAM. At a minimum, PDTs will outline a scope that is compliant with the current policy of 3-year total study duration and \$3 million total study cost. (Reference 2.a). This 3x3 compliant COA should result in a complete study with the associated risks documented.

(1) If the PDT identifies that the 3x3 policy compliant COA does not fully meet the intent of the study objectives or would not result in a Chief's Report, the PDT, with the sponsor, may draft one or more alternative COAs that requires additional schedule and/or funding. The alternative COA(s) will describe the risks that will be reduced with additional amounts above the base schedule and funding.

(2) VTAMs supporting an alternative study scope (COA beyond 3 years and \$3 million total study cost) will be used to support the exception process. In addition to the VTAM, the MSC will prepare and provide other elements of the exception package: the PMP; a report summary; the study risk register; briefing slides; and a statement that the non-federal sponsor has been consulted and concurs with the schedule and funding stream. See paragraph 2-12 of EP 1105-2-61.

g. Vertical Engagement and Alignment. Timely and appropriate vertical team engagement is critical to the effective and efficient use of USACE expertise in the development of the VTAM.

(1) Planning Centers of Expertise (PCX): The District project manager and/or planner will contact the appropriate PCX within the first week of receiving study (project) funds to ensure the study scope development is coordinated with the PCX.

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(2) District: The District Commander will review, endorse, and submit the VTAM package to the MSC. If an updated VTAM is required due to change in study scope and cost, the District Commander will inform the MSC Commander of the need for an updated VTAM to be prepared and provided to Headquarters.

(3) Major Subordinate Command (MSC): The MSC will coordinate and confirm vertical alignment with Headquarters elements in Planning and Policy, Engineering and Construction, Operations, and Real Estate, and with the Review Management Organization and Policy and Legal Compliance Review Team. If the VTAM supports an alternative study scope (beyond 3 years and \$3 million total study cost) the MSC prepares the package that will be used to support the exception process (see EP 1105-2-61, paragraph 2-12). The VTAM will be included in the package.

(4) Headquarters: Once received at Headquarters there will be no additional HQ reviews, Senior Leaders panel, nor routing of a VTAM. The vertical alignment is confirmed by the MSC Commander's signature and will not be revisited unless directed by the DCG-CEO.

h. Vertical Team Alignment Memorandum Review Process. The study review plan will include a defined process and timeline for development and appropriate review of the VTAM. This will be included in the initial draft version of the review plan in order to agree on this process early in the study.

7. Policy Exception Requirements

This memorandum does not alter any requirements to obtain a policy exception from the Assistant Secretary of the Army (Civil Works) (ASA(CW)) for feasibility studies that exceed \$3 million in Federal cost or exceed a duration of three years. See EP 1105-2-61 paragraph 2-12 and reference 1.a.

8. Implementation

a. I ask that each of you, along with your Planning and Policy Chiefs and Project Managers, engage our project partners and stakeholders regarding this directive and discuss its multiple and varying implications on studies.

b. The point of contact for this effort is Ms. Susan Werning, Deputy Chief of the Planning Community of Practice. Mrs. Werning can be reached at Susan.E.Layton@usace.army.mil or (202) 510-1701.

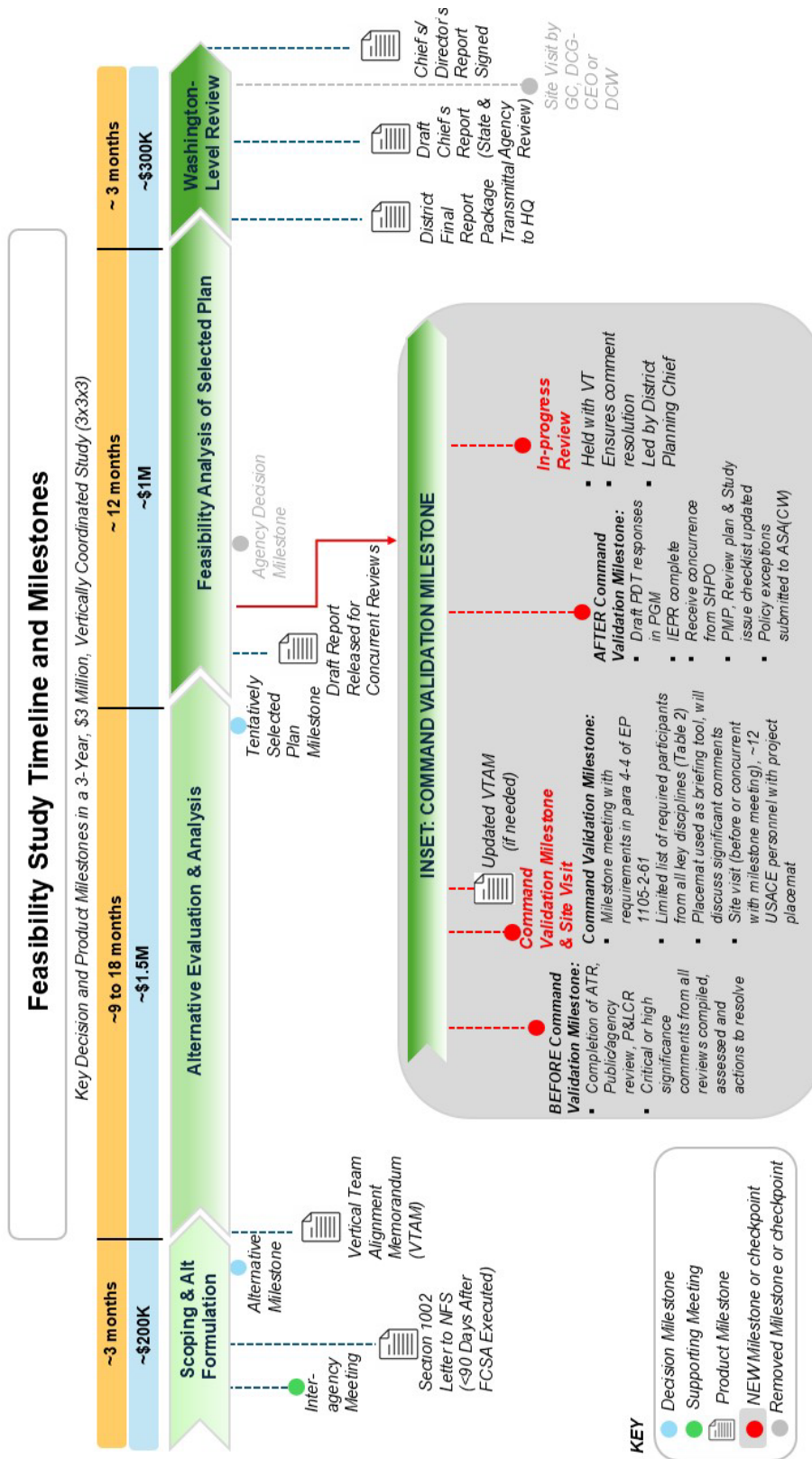
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1. Summary of Command Validation Milestone
2. VTAM Template



Jason E. Kelly
Major General, U.S.A
Deputy Commanding General
for Civil and Emergency Operations

Enclosure 1: Summary of Command Validation Milestone





DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
[MSC LETTERHEAD]

[MSC OFFICE SYMBOL]

[Date]

MEMORANDUM FOR COMMANDER, U.S. Army Corps of Engineers, 441 G Street, NW, Washington, DC 20314-1000

SUBJECT: Vertical Team Alignment Memorandum (VTAM) – _____ [Study name, type of study/report]

1. References. [include all pertinent references]

a. ASA(CW) memorandum, Implementation Guidance for Section 1001 of the Water Resources Reform and Development Act of 2014, Vertical Integration and Acceleration of Studies as amended by Section 1330(b) of the Water Resources Development Act of 2018, 8 March 2019.

b. CECW-EC memorandum, Guidance on Cost Engineering Products update for Civil Works Projects in accordance with Engineer Regulation 1110-2-1302 – Civil Works Cost Engineering, dated 5 June 2023.

c. EP 1105-2-61, Feasibility and Post-Authorization Study Procedures and Report Processing Requirements, 1 July 2023.

d. ER 1110-2-1302, Civil Works Cost Engineering, 30 June 2016.

2. Purpose. This Vertical Team Alignment Memorandum (VTAM) documents the aligned scope, schedule, and funding stream for the _____. [Insert the official study (project) name.]

3. Background. [Provide a brief summary of the study.]

4. Study Scope. [Provide a summary of the study's vertically aligned scope. If an alternative course of action (COA) with a scope beyond 3 years and \$3M federal is the vertically aligned recommended scope, include both the recommended alternative COA and 3x3 policy compliant COA. The PDT, with the sponsor, may draft one or more alternative study scope(s) (COAs) that require additional schedule and/or budget. Describe the risks that will be reduced with additional amounts above the base schedule and budget.]

5. Study Schedule and Funding Stream. [Provide a summary of the timeline and cost for the recommended scope, including adequate schedule and funding contingency.]

a. Include table with the study schedule as entered in PROMIS. At a minimum, include the following study milestone dates:

- Agreement (Feasibility Cost Sharing Agreement) Execution (CW130)
- Tentatively Selected Plan Milestone (CW262)
- Release draft report for public review (CW250)
- Command Validation Milestone / Agency Decision Milestone (CW263)
- Final Report transmitted to Headquarters (CW160)
- Chief's or Director's Report signed (CW269 or CW270)

b. Include two tables with the funding stream over the course of the study. The funding stream tables must include funding amounts appropriated or allocated in a work plan or spend plan, any reprogrammings if applicable, amounts included in published President's Budgets, and current/future capabilities, but not past obligations or expenditure amounts. If there is a high risk of a funding gap, describe the risk and consequences of a gap in funding. The funding stream tables should include details on anticipated federal portion of the Independent External Peer Review (IEPR) funding needed (if applicable).

- One table will provide the funding stream by fiscal year.
- One table will provide the funding stream by milestone (see paragraph 5a).

6. 3x3x3 Rule Compliance. State whether the scope, schedule, and budget will exceed the requirements in Reference a. If the scope exceeds 3 years or \$3 million add the following information:

a. Summary of study complexity factors (as established in Reference a.).

b. Total projected study duration if policy exception is approved (in months).

c. Total study cost, if policy exception is approved, broken down with federal/non-federal cost share and the federal portion of the IEPR cost.

7. Risk and Uncertainty. Signature of the VTAM certifies that all applicable and known study risks have been evaluated, risk mitigation plans have been developed, and a risk management option has been selected and will be implemented for each risk. [Provide direct link to the project's eRisk Register and contact information of the Project Manager responsible for the study's risk register.]

8. Project Management Plan. Signature of the VTAM certifies that a complete and detailed Project Management Plan (PMP) with an accurate scope, schedule, and budget has been prepared for the study. For a copy of the PMP, contact the study Project Manager.

9. Review Plan. Signature of the VTAM certifies that a complete Review Plan has been prepared and approved for the study. For a copy of the Review Plan, contact the study Project Manager.

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10. Design Maturity. Signature of the VTAM certifies the District Chief of Engineering and Construction has confirmed there are sufficient resources and schedule to achieve an appropriate design maturity that will result in a class 3 estimate that includes full scope of the design in the final feasibility report (ref. ER 1110-2-1302 and CECW-EC memorandum, Guidance on Cost Engineering Products update for Civil Works Projects in accordance with Engineer Regulation 1110-2-1302 – Civil Works Cost Engineering, dated 5 June 2023).

11. Vertical Team Alignment: [The Policy and Legal Compliance Review manager will document here vertical alignment on the study's scope, schedule, and funding stream. This paragraph will also document any non-alignment with the reason for disagreement and why alignment could not be reached.]

12. Please direct any questions or requests for information to the undersigned at _____ [phone], _____ [e-mail], or _____ [name], Chief, _____ [MSC] Planning & Policy Division, at _____ [phone], _____ [e-mail].

Encl [if applicable]

[NAME – MSC Commander]
[Rank], EN
Commanding